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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ZAINA DOUMAT, individually,

Plaintiff,

v.

TARGET CORPORATION;
DOES I-V; and ROE CORPORATIONS II-V,
inclusive,

Defendants.

CASE NO. 2:23-cv-01231-APG-DJA

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(First Request)

Pursuant to LR 6.1 and LR 26.4, the parties, by and through their respective counsel of record, hereby stipulate and request that this Court extend discovery in the above-captioned case ninety (90) days as set forth below:

Discovery Completed:

1. All parties have made their initial and supplemental disclosures pursuant to FRCP 26.
2. Plaintiff served Defendant with Interrogatories, Request for Admissions, and Requests for Production of Documents.
3. Defendant served Plaintiff with Interrogatories, Request for Admissions, and Request for Production of Documents.
4. Defendant's responded to Plaintiff's written discovery.

Discovery that remains to be completed:

1. Deposition of the Rule 30(b)(6) witness on behalf of the Defendant.
2. Deposition of Plaintiff

3. Deposition of Plaintiff's treating physicians.
4. Both parties need to retain experts.
5. Both parties need to depose the experts retained.
6. Site inspection of the premises.

Reasons that Discovery has not yet been completed are:

The parties have been conducting discovery. Defendant served Plaintiff with written discovery on October 31, 2023. As discovery has progressed, however, Plaintiff and counsel have reached a substantial impasse regarding the case and Plaintiff's counsel filed a Motion to Withdraw as Counsel for Plaintiff on November 3, 2023 (Doc 17). Plaintiff's Motion to Withdraw is pending before the court. At the same time, Plaintiff and Defendant agree the discovery deadlines should be extended to allow Plaintiff's counsel to withdraw, at which point Defendant intends to depose Plaintiff and possibly conduct a Fed. R. Civ. P. 35 examination of Plaintiff.

Therefore, the parties request an additional ninety (90) days to allow Plaintiff's counsel to withdraw. This request is not made in bad faith, with dilatory motive, or for any purposes of improper delay.

Proposed schedule for completing discovery:

Accordingly, the parties request the discovery deadlines be extended to allow ample time for the court to make its ruling and allow the parties to complete the remaining discovery.

The following is a list of discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Amend Pleadings and Add Parties	November 2, 2023	January 31, 2024
Initial Disclosure of Experts	December 1, 2023	March 1, 2024
Disclosure of Rebuttal Experts	January 2, 2024	April 2, 2024
Discovery Cut-Off	January 31, 2024	May 1, 2024
Dispositive Motions	March 2, 2024	May 31, 2024
Joint Proposed Pre-trial Order	April 3, 2024	July 1, 2024

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WHEREFORE, the parties respectfully request this honorable Court adopt the foregoing stipulation of the parties which will result in the new discovery deadlines.

ER INJURY ATTORNEYS

PERRY & WESTBROOK

By: /s/ Craig A. Henderson
 Craig A. Henderson, Esq.
 Nevada Bar No. 10077
 1700 S. Pavilion Center Dr., Ste. 530
 Las Vegas, Nevada 89135
Counsel for Plaintiff

By: /s/ Alan W. Westbrook
 Alan W. Westbrook, Esq.
 Nevada Bar No. 6167
 11500 S. Eastern Ste. 140
 Henderson, Nevada 89051
Attorney for Defendants

ORDER

IT IS SO ORDERED that the discovery deadlines are hereby extended as follows:

Scheduled Event	New Deadlines
Amend Pleadings and Add Parties	January 31, 2024
Initial Disclosure of Experts	March 1, 2024
Disclosure of Rebuttal Experts	April 2, 2024
Discovery Cut-Off	May 1, 2024
Dispositive Motions	May 31, 2024
Joint Proposed Pre-trial Order	July 1, 2024

DATED this 27th day of November, 2023.


 DANIEL J. ALBREGTS
 UNITED STATES MAGISTRATE JUDGE

ER INJURY ATTORNEYS

By: /s/ Craig A. Henderson
 Craig A. Henderson, Esq.
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 1700 S. Pavilion Center Dr., Ste. 530
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Attorney for Plaintiff



Miriam Alvarez <miriam@erinjuryattorneys.com>

RE: Doumat v. Target -- SAO to Extend Discovery

1 message

Alan Westbrook <awestbrook@perrywestbrook.com>

Wed, Nov 22, 2023 at 9:47 AM

To: Miriam Alvarez <miriam@erinjuryattorneys.com>, Veronica Gonzalez <vgonzalez@perrywestbrook.com>

Cc: Craig Henderson <craig@erinjuryattorneys.com>, Jennifer Mosley <jmosley@perrywestbrook.com>, Paul Sheldon <psheldon@perrywestbrook.com>, "zainadoumatz11630426@projects.filevine.com" <zainadoumatz11630426@projects.filevine.com>

Hello Miriam,

Sorry, this got lost in my pile of e-mails but, yes, please affix my signature. We will need to get an IME scheduled, I know that the stip said possible. We had some dates, but as Craig and I discussed, it is challenging when you have a motion to withdraw pending, so we are waiting on this extension.

Thank you and have a Happy Thanksgiving!

Alan

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From: Miriam Alvarez <miriam@erinjuryattorneys.com>**Sent:** Friday, November 17, 2023 8:44 AM**To:** Veronica Gonzalez <vgonzalez@perrywestbrook.com>**Cc:** Craig Henderson <craig@erinjuryattorneys.com>; Jennifer Mosley <jmosley@perrywestbrook.com>; Paul Sheldon <psheldon@perrywestbrook.com>; zainadoumatz11630426@projects.filevine.com; Alan Westbrook <awestbrook@perrywestbrook.com>**Subject:** Doumat v. Target -- SAO to Extend Discovery

Hi Alan-- Attached is the SAO to Extend Discovery for your review. Please let us know if we can file using your e-signature. Thank you.